

REMARKS

In the Final Office Action, the Examiner rejected claims 1-4, 6-8, 10, 11, 29-35, 43-46, 48-50, 52, 53, 71-77, 85, 87, 89, and 91 under 35 U.S.C. § 102(e) as being anticipated by *French et al.*, U.S. Patent 6,282,658 and rejected claims 5, 9, 12-20, 23-28, 36-39, 51, 54-62, 65-70, 78-81, 86, 88, 90, and 92 under 35 U.S.C. § 103(a) as being obvious over *French et al.* The Examiner also rejected claims 21, 22, 40-42, 63, 64, and 82-84 under 35 U.S.C. § 103(a) as being unpatentable over *French et al.* in view of *Messing*, U.S. Patent 6,745,327. Claim 47 does not appear to be listed in the text of the Office Action, but claims 1-92 are all listed as rejected in the summary of the Office Action. Because claim 47 contains recitations similar to claim 5, Applicants assume that the Examiner meant to reject claim 47 as being obvious over *French et al.*

By this amendment, Applicants have amended claims 1, 4 13, 14, 16, 21, 23, 24, 26, 29, 32, 33, 34, 36, 40, 43, 46, 55, 56, 58, 63, 65, 66, 68, 71, 75, 76, 78, 82, and 85-92. Claims 1-92 remain pending.

Applicants respectfully request reconsideration of the Examiner's rejections at least because the cited references do not teach or suggest every element of claims 1-92 as amended.

For example, amended independent claim 1 recites a method for issuing a digital certificate to a user having an electronic account on a network, including the stages of sending an identification verification form to a physical address of the user and receiving the identification verification form from the user in person at a proofing workstation. Claim 1 further recites verifying the identity of the user in person using the identification verification form at the proofing workstation.

Neither *French et al.* nor *Messing* teaches or suggests such a method. Instead,

French et al. discloses a system and method for authentication of network users using a digital certificate, but *French et al.* does not disclose a system and method for issuing a digital certificate as claimed. (*French et al.*, Abstract.) In *French et al.*, during preprocessing for the digital certificate, the user supplies electronic identification information such as an address, driver's license date, and social security number. (*Id.*, col. 7, ll. 46 - col. 8, l. 3.) Further, this preprocessing may include a set of validation checks including address validation, area code validation, etc. (*Id.*, col. 8, ll. 50-55). However, *French et al.* fails to disclose or suggest sending an identification verification form to a physical address of the user and receiving the identification verification form from the user in person at a proofing workstation. *French et al.* also fails to disclose or suggest verifying the identity of the user in person using an identification verification form at the proofing workstation.

Messing does not cure these defects. *Messing* discloses a program for using user-supplied data such as a photograph, a public key, a retinal scan, fingerprints, or a handwriting sample to create an electronic certificate signature (*Messing*, Fig. 1; col. 6, ll. 1-14). Although *Messing* states "[p]ersonal information (FIG 1., no. 12), is verified in person by an agent," (*Messing*, col. 6, ll. 1-4) the reference does not teach or suggest the steps of sending an identification verification form to a physical address of the user and receiving the identification verification form from the user in person at a proofing workstation. Further, *Messing* does not teach or suggest verifying the identity of the user in person using an identification verification form at the proofing workstation.

In summary, neither *French et al.* nor *Messing* teaches or suggests issuing a digital certificate to a user having an electronic account on a network based on the

combination of (1) sending an identification verification form to a physical address of the user, (2) receiving the identification verification form from the user in person at a proofing workstation, and (3) verifying the identity of the user in person using the identification verification form.

For at least the reasons given above, the cited references do not teach or suggest every element recited in claim 1. Therefore, neither *French et al.* nor *Messing*, taken alone or in combination, can anticipate or render obvious the subject matter of claim 1 or its dependent claims 2-15.

Claims 43, 85, and 89 contain recitations similar to those discussed above with respect to claim 1. Therefore, for the reasons give above with respect to claim 1, neither *French et al.* nor *Messing*, taken separately or together, can anticipate or render obvious the subject matter of claims 43 (and its dependent claims 44-57), 85, and 89.

As with claim 1, amended claim 16 also recites a method for issuing a digital certificate to a user having an electronic account on a network, including the stages of sending an identification verification form to a physical address of the user and receiving the identification form from the user in person at a proofing workstation. In addition, claim 16 further recites verifying via an identification verification form the identity of the user with information provided by the user in person at the proofing workstation. As discussed above, *French et al.* and *Messing*, taken alone or in combination, fail to teach or suggest at least verifying via an identification verification form the identity of the user with information provided by the user in person at the proofing workstation. The references also fail to disclose or suggest sending an identification verification form to a physical address of the user and receiving the identification verification form from the

user in person at a proofing workstation. Therefore, neither *French et al.* nor *Messing*, taken alone or in combination, can anticipate or render obvious the subject matter of claim 16 or its dependent claims 17-28.

Claims 58, 86, and 90 contain recitations similar to those discussed above with respect to claim 16. Therefore, for the reasons given above with respect to claim 16, neither *French et al.* nor *Messing*, taken separately or together, can anticipate or render obvious the subject matter of claims 58 (and its dependent claims 59-70), 86, and 90.

Similar to claims 1 and 16, amended claim 29 recites a method for processing a request for a digital certificate from a user having an electronic account on a network, including the stages of receiving, at a proofing workstation, user information for the user with the electronic account, including an identification verification form previously sent to a physical address of the user and verifying at the proofing workstation, identification information from the user in person at the proofing workstation. Claim 29 further recites sending an identification verification by the proofing workstation to a proofing server, when the user information has been matched to the identification information received from the user in person. As discussed above, *French et al.* and *Messing*, taken alone or in combination, fail to teach or suggest at least receiving, at a proofing workstation, user information for the user with the electronic account, including an identification verification form previously sent to a physical address of the user. The references also fail to teach or suggest sending an identification verification by the proofing workstation to a proofing server, when the user information has been matched to the identification information received from the user in person. Therefore, neither *French et al.* nor

Messing, taken alone or in combination, can anticipate or render obvious the subject matter of claim 29 or its dependent claims 30-35.

Claims 71, 87, and 91 contain recitations similar to those discussed above with respect to claim 29. Therefore, for the reasons given above with respect to claim 29, neither *French et al.* nor *Messing*, taken separately or together, can anticipate or render obvious the subject matter of claims 71 (and its dependent claims 72-77), 87, and 91.

Claim 36 recites a method for issuing a digital certificate to a user having an electronic account on a network, including the stage of receiving, by a proofing server, an identification verification from a proofing workstation when the identity of the user has been verified in person at the proofing workstation based on an identification verification form previously sent to a physical address of the user. As discussed above, *French et al.* and *Messing*, taken alone or in combination, fail to teach or suggest at least receiving, by a proofing server, an identification verification from a proofing workstation when the identity of the user has been verified in person at the proofing workstation based on an identification verification form previously sent to a physical address of the user. Therefore, neither *French et al.* nor *Messing*, taken alone or in combination, can anticipate or render obvious the subject matter of claim 36 or its dependent claims 37-42.

Claims 78, 88, and 92 contain recitations similar to those discussed above with respect to claim 36. Therefore, for the reasons give above with respect to claim 36, neither *French et al.* nor *Messing*, taken separately or together, can anticipate or render obvious the subject matter of claims 78 (and its dependent claims 79-84), 88, and 92.


In view of the foregoing amendments and remarks, Applicants respectfully request continued examination of this application and the timely allowance of pending claims 1-92.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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